

July 14, 2003

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
CY-B402
Washington, DC, 20554

Re: Application by SBC Communications Inc., Michigan Bell Telephone Company, and Southwestern Bell Communications Services, Inc. for Provision of In-Region, InterLATA Services in Michigan
WC Docket No. 03-138

Dear Ms. Dortch:

VarTec Telecom, Inc. (“VarTec”) provides service in all 5 states in SBC’s Midwest region, and across the United States and wishes to provide information regarding SBC’s improved performance.

VarTec recognizes that SBC has made significant strides with respect to its OSS and billing processes. VarTec has seen a marked improvement in the accuracy of its bills since SBC filed its last Michigan 271 application in January. SBC has made a number of improvements to its billing system and had Ernst & Young independently validate that these changes were successfully implemented.¹ Combined with the additional assurances that BearingPoint’s evaluation provides regarding SBC’s OSS and billing systems, to VarTec’s knowledge, SBC has cured the problems that had plagued its previous applications relative to billing.

VarTec understands that the billing processes and systems of any RBOC are enormously complex. Any expectation that the systems would always function without error would be

¹ SBC Supplemental Application, Brief at 15; *see also* SBC Supplemental Application, Supplemental Affidavit of Justin W. Brown, Mark J. Cottrell, and Michael E. Flynn Regarding Billing.

unrealistic. Nevertheless, VarTec depends upon the bills it receives from SBC to meet SBC's obligations under the 1996 Act – that the bills be “complete, accurate, and timely.”²

When a dispute does arise, VarTec has worked within SBC's dispute resolution process to identify and successfully correct the root cause of the problem. Neither the billing issues that VarTec has experienced in the past nor the billing problems and corrections that SBC described in its Application constitute vast, systemic or procedural billing problems. These problems are discrete and independent occurrences in a very complex system.

SBC's attempts to correct billing problems should be commended; however, SBC's work is not yet finished. While VarTec believes that SBC's recent improvements have rectified the previous billing issues that VarTec and many other CLECs experienced, VarTec hopes that the SBC's Compliance Improvement Plans and Performance Remedy Plan will provide continued assurance that SBC's bills will remain complete, timely, and accurate and that its OSS remains accessible to all CLECs.

Taking these factors into consideration, we can state that VarTec has received comparable or better billing performance from SBC in the Midwest than it has in the other SBC or ILEC states.

Respectfully submitted,

Connie F. Mitchell, Founder
Chief Administrative Officer
VarTec Telecom, Inc.

² *Application by Verizon New Jersey Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance (d/b/a Verizon Enterprise Solutions), Verizon Global Networks Inc., and Verizon Select Services Inc., for Authorization To Provide In-Region, InterLATA Services in New Jersey*, WC Docket No. 02-67, FCC 02-189, ¶ 121 (June 24, 2002).

